

**IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND  
(NORTHERN DIVISION)**

ERIE INSURANCE EXCHANGE	:
t/i/o/u and t/u/o	
JODY B. ROSEN	:
and	:
JODY B. ROSEN, Individually	:
and	:
ERIE INSURANCE EXCHANGE	:
t/i/o/u and t/u/o	
HOLLINGTON CONDOMINIUM COUNCIL OF UNIT OWNERS	:
and	:
HOLLINGTON CONDOMINIUM COUNCIL OF UNIT OWNERS, Individually	:
Plaintiffs	:
vs.	: Case No. CCB-03CV143
SONY ELECTRONICS, INC.	:
Defendant	:

**PLAINTIFFS' MOTION TO MODIFY SCHEDULING ORDER WITH THE CONSENT  
OF DEFENDANT**

COME NOW the Plaintiffs, Erie Insurance Exchange t/i/o/u and t/u/o Jody B. Rosen, Jody B. Rosen, Individually, Erie Insurance Exchange t/i/o/u and t/u/o Hollington Condominium Council of Unit Owners and Hollington Condominium Council of Unit Owners, Individually, by their attorneys McCarthy Wilson

and Edward J. Brown, and file this Motion to Modify Scheduling Order, and state:

1. That pursuant to the Scheduling Order, Plaintiffs' Rule 26(a)(2) Disclosures are due on or before April 7, 2003, and Defendant's Rule 26(a)(2) Disclosures are due on or about May 5, 2003.

2. That the parties are diligently and cooperatively pursuing their discovery obligations; however, the parties have not yet completed the initial exchange of paper discovery responses and/or an inspection of the evidence which survived the fire at issue in this case.

3. That a modification of the Scheduling Order by a forty-five (45) day extension of all presently set dates would not prejudice either party, and will still allow for the prompt resolution and/or adjudication of this matter.

4. That Defendant consents to this Motion.

WHEREFORE, Plaintiffs respectfully move this Court to grant it Motion to Modify Scheduling Order and extend all Scheduling Order dates by forty-five (45) days.

Respectfully submitted,

McCARTHY WILSON

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Edward J. Brown, Esquire  
100 South Washington Street  
Rockville, Maryland 20850  
(301) 762-7770  
Attorneys for Plaintiffs

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this \_\_\_\_\_ day of April, 2003 a copy of the foregoing Plaintiffs' Motion to Modify Scheduling Order was mailed, postage prepaid to:

Timothy L. Mullin, Esquire  
Lauren N. Schultz, Esquire  
Miles & Stockbridge, P.C.  
10 Light Street, Suite 700  
Baltimore, Maryland 21202  
Attorneys for Defendant

Robert J. Hafner, Esquire  
Lavin, Coleman, O'Neil, Ricci,  
Finarelli & Gray  
Suite 1000 - Penn Mutual Tower  
510 Walnut Street  
Philadelphia, Pennsylvania 19106  
Attorneys for Defendant

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Edward J. Brown, Esquire

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SONY ELECTRONICS, INC.	:
Defendant	:

**ORDER**

UPON CONSIDERATION of the foregoing Plaintiffs' Motion to Modify Scheduling Order, and good cause having been shown, it is this \_\_\_\_\_ day of \_\_\_\_\_, 2003, by the United States District Court for the District of Maryland, hereby

ORDERED, that Plaintiffs' Motion to Modify Scheduling Order be and the same hereby is GRANTED; and, it is further ORDERED, that the Scheduling Order in the above-captioned action be and the same hereby is MODIFIED AS FOLLOWS:

Plaintiff's Rule 26(a)(2) disclosures 5/22/03  
re experts

Defendant's Rule 26(a)(2) disclosures 6/19/03  
re experts

Plaintiff's rebuttal Rule 26(a)(2) disclosures 7/3/03  
re experts

Rule 26(e)(2) supplementation of disclosures and responses 7/11/03

Discovery deadline: submission of status report 8/3/03

Requests for admission 8/10/03

Dispositive pretrial motions deadline 9/4/03

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Judge, United States District Court for the District of Maryland

Copies to:

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McCarthy Wilson  
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Rockville, Maryland 20850

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Miles & Stockbridge, P.C.  
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